

September 09, 2025

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IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
CASE NO.: 2:25-cv-14047-DMM

GEM Products, LLC,

Plaintiff,

-vs-

Rupp Marine, Inc.,

Defendant.



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VIDEOTAPED DEPOSITION OF SCOTT RUPP

CONFIDENTIAL - ATTORNEYS' EYES ONLY

Tuesday, September 9, 2025  
9:11 - 4:47 p.m.

525 Okeechobee Boulevard  
Suite 900  
West Palm Beach, Florida 33401

Reported By:  
Wendy Beath Anderson, RDR, CRR, CRC  
Notary Public, State of Florida  
Job #6957900-001

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<p style="text-align: right;">Page 146</p> <p>1 Q. Do you happen to know whether there were any</p> <p>2 drawings that were sent to any manufacturing parties</p> <p>3 within the last five years?</p> <p>4 A. I would -- I don't know about that.</p> <p>5 Q. Why not?</p> <p>6 A. I just -- I don't have a hands-on approach</p> <p>7 or -- to our purchasing as I once did 20 years ago.</p> <p>8 Q. Have there been changes to this product</p> <p>9 over -- within the last five years that would have</p> <p>10 necessitated new drawings?</p> <p>11 A. Just those screws.</p> <p>12 Q. Would you have sent new drawings to anyone --</p> <p>13 A. No. For the screws? No, that's -- like I</p> <p>14 said, that's an off-the-shelf item.</p> <p>15 Q. A little while ago it seemed to me that you</p> <p>16 testified that you knew specifically that you had sent</p> <p>17 drawings, not this specific drawing, but drawings</p> <p>18 related to the housing to a company called Richland?</p> <p>19 A. Right.</p> <p>20 Q. Do you happen to know, yes or no, whether Rupp</p> <p>21 still possesses that?</p> <p>22 A. Would we have sent them recently?</p> <p>23 Q. I'm asking whether you --</p> <p>24 A. No, we would not have.</p> <p>25 Q. I'm asking whether you know if you still</p>	<p style="text-align: right;">Page 147</p> <p>1 possess them today?</p> <p>2 A. If they're hand drawings, I can't say.</p> <p>3 Q. And if they're computer drawings?</p> <p>4 A. They'd be buried in there somewhere. I would</p> <p>5 have to assume they are.</p> <p>6 Q. Okay. What about with respect to these Rupp</p> <p>7 carbon fiber pulley upgrades?</p> <p>8 A. Right.</p> <p>9 Q. Do you happen to know whether this product has</p> <p>10 gone through any iterations --</p> <p>11 A. No.</p> <p>12 Q. -- different than what is depicted here?</p> <p>13 A. It's no -- no changes to that.</p> <p>14 Q. Who was on the conceptualization team for this</p> <p>15 product?</p> <p>16 MR. LOCKTON: Object to form.</p> <p>17 THE WITNESS: Several people.</p> <p>18 BY MR. PFISTER:</p> <p>19 Q. Who?</p> <p>20 A. Well, myself, a couple of CAD designers were</p> <p>21 working with us. Ron had a hand in that too.</p> <p>22 Q. Are these types of drawings that are shown on</p> <p>23 Rupp 2406 and Rupp 2403, are these considered CAD</p> <p>24 drawings?</p> <p>25 A. Yeah, I would call them that.</p>
<p style="text-align: right;">Page 148</p> <p>1 Q. Are you familiar with what CAD is as a</p> <p>2 computer program?</p> <p>3 A. Computer -- yeah, I know the program we use,</p> <p>4 Computer Assisted Design, or whatever it's called.</p> <p>5 Q. Do you happen to know whether in the CAD</p> <p>6 application on your computer the drawings that you have</p> <p>7 resemble the drawings that are shown here on these, Rupp</p> <p>8 2403 and Rupp 2406?</p> <p>9 A. Yes, those would probably -- I mean, unless</p> <p>10 somebody deleted them, they would be there somewhere.</p> <p>11 Q. Okay. Do you -- or do you provide to your</p> <p>12 third-party manufacturing partners, do the drawings that</p> <p>13 you provide them have measurements and specifications</p> <p>14 for the products?</p> <p>15 MR. LOCKTON: Object to form.</p> <p>16 THE WITNESS: Of course. I mean, they've got</p> <p>17 to have a guideline on how to make them.</p> <p>18 BY MR. PFISTER:</p> <p>19 Q. If you wouldn't mind, sir, pulling up</p> <p>20 Rupp 2403, which I don't remember which exhibit. I</p> <p>21 think that's ten.</p> <p>22 A. Right up top here, okay.</p> <p>23 Q. Could you tell me whether you see on that</p> <p>24 document measurements for the products or for the parts?</p> <p>25 A. No.</p>	<p style="text-align: right;">Page 149</p> <p>1 Q. There are no measurements of any kind --</p> <p>2 A. I don't see any.</p> <p>3 Q. If you flip to the next page, Rupp 2404.</p> <p>4 A. Yes.</p> <p>5 Q. Could you tell me whether there are any</p> <p>6 measurements on this document?</p> <p>7 A. I don't see any.</p> <p>8 Q. But you stated that you would have had to have</p> <p>9 sent drawings with measurements to your third-party</p> <p>10 manufacturing partners?</p> <p>11 MR. LOCKTON: Object to form.</p> <p>12 THE WITNESS: Well, sure, at some point in</p> <p>13 time.</p> <p>14 BY MR. PFISTER:</p> <p>15 Q. Do you happen to know whether you still have</p> <p>16 those drawings with measurements?</p> <p>17 A. I do not know for sure. Some of these are</p> <p>18 older parts. If they were older, they would have been</p> <p>19 hand-drawn. If that's the case, I don't -- I couldn't</p> <p>20 lay my hands on them. I can't say for sure. Some of</p> <p>21 these could be a CAD.</p> <p>22 Q. What about for parts that you would consider</p> <p>23 newer parts?</p> <p>24 A. Newer parts we would have probably a -- yes,</p> <p>25 there would be a drawing for it.</p>

<p style="text-align: right;">Page 174</p> <p>1 A. I see one.</p> <p>2 Q. What about Rupp 000 --</p> <p>3 A. Are we going to talk a little more about that</p> <p>4 one?</p> <p>5 Q. No, we're moving on.</p> <p>6 A. Why? I would like to. This guy could have</p> <p>7 more than one, I mean, but I guess he chooses not to.</p> <p>8 Why isn't he? He's not taking full advantage of his</p> <p>9 outrigger. He should have at least one more on each of</p> <p>10 these, so...</p> <p>11 Q. Would you say that the outriggering</p> <p>12 configuration --</p> <p>13 A. Again, I'm not a professional fisherman. I</p> <p>14 don't do it for a living.</p> <p>15 Q. Based on what you just said, would you say</p> <p>16 that this rigging configuration is suboptimal?</p> <p>17 MR. LOCKTON: Object to form.</p> <p>18 THE WITNESS: Yeah, that's according to whose</p> <p>19 opinion?</p> <p>20 BY MR. PFISTER:</p> <p>21 Q. Yours.</p> <p>22 A. Not mine. To me that would be perfect. I</p> <p>23 don't -- if I fish, it's probably -- you know, my boat</p> <p>24 by myself, that would be ideal.</p> <p>25 Q. I just asked because of the pejorative</p>	<p style="text-align: right;">Page 175</p> <p>1 testimony you just gave. I just wasn't sure whether or</p> <p>2 not you believed it to be suboptimal or not.</p> <p>3 Let's move on to Rupp 000034. Could you tell</p> <p>4 me on outrigger --</p> <p>5 A. Did we skip 33?</p> <p>6 Q. We did.</p> <p>7 A. All right.</p> <p>8 Q. Trying to be expeditious here.</p> <p>9 In terms of 000034, could you tell me how many</p> <p>10 halyard lines you see on each outrigger pole?</p> <p>11 A. Okay. On there it looks like they're using</p> <p>12 three. They should be color-coded. They're all the</p> <p>13 same if it's a halyard line. Just for, you know,</p> <p>14 drawing perspective.</p> <p>15 Okay. So what do you say? There's three, I</p> <p>16 guess so.</p> <p>17 Q. Is there anything attached to those three</p> <p>18 outrigger -- or excuse me, halyard lines on each</p> <p>19 outrigger?</p> <p>20 A. Yeah, it looks like you got two outrigger</p> <p>21 clips to each rigger, halyard lock, stainless ring with</p> <p>22 a teaser, two hooks on each outrigger, capable of</p> <p>23 catching a fish.</p> <p>24 Q. Is -- when you referenced stainless ring and</p> <p>25 two outrigger clips, are those connected respectively to</p>
<p style="text-align: right;">Page 176</p> <p>1 one halyard line?</p> <p>2 MR. LOCKTON: Object to form.</p> <p>3 THE WITNESS: It could be via this drawing.</p> <p>4 However, you could add multiple to one line.</p> <p>5 BY MR. PFISTER:</p> <p>6 Q. Does this drawing show one connected to each</p> <p>7 halyard line?</p> <p>8 A. By -- it looks like there is.</p> <p>9 Q. All right. Okay. Thank you.</p> <p>10 MR. PFISTER: Lunch?</p> <p>11 MR. LOCKTON: That will work.</p> <p>12 THE WITNESS: Good idea.</p> <p>13 THE VIDEOGRAPHER: We're off the record.</p> <p>14 (A break was had.)</p> <p>15 THE VIDEOGRAPHER: We're back on the record.</p> <p>16 BY MR. PFISTER:</p> <p>17 Q. Okay. Mr. Karpanty -- excuse me. Mr. Rupp,</p> <p>18 thank you for this morning. Hopefully, we can get</p> <p>19 through the afternoon smoothly. I wanted to go back to</p> <p>20 something we were talking about earlier, which was some</p> <p>21 drawings, some CAD drawings, as you referred to them,</p> <p>22 involving the Rupp pulleys.</p> <p>23 How many people did you say work in your</p> <p>24 drawing department?</p> <p>25 A. I would say two, three.</p>	<p style="text-align: right;">Page 177</p> <p>1 Q. Who are those people?</p> <p>2 A. It would be myself, Joe.</p> <p>3 Q. Joe who?</p> <p>4 A. Joe Hardy.</p> <p>5 Q. And who else?</p> <p>6 A. That's probably it. Now, there's some</p> <p>7 deceased people that were handling a lot of our stuff.</p> <p>8 Q. And so you and Mr. Hardy, what do you do in</p> <p>9 the drawing department?</p> <p>10 A. Him more so than I, like I said, when we were</p> <p>11 drawing back in the day, when it was drafting on a</p> <p>12 table, I did myself and my father all of it. When it</p> <p>13 came to 3D modeling a CAD system, I don't know much</p> <p>14 about it. That's why I don't participate in that fully.</p> <p>15 Q. Do you participate --</p> <p>16 A. I can access things, but the file management</p> <p>17 is a little bit out of my scope.</p> <p>18 Q. Whose scope is the file management within?</p> <p>19 A. It would be probably Joe.</p> <p>20 Q. Does he have a written policy regarding file</p> <p>21 management for his design drawings?</p> <p>22 A. No.</p> <p>23 Q. Does Mr. Hardy regularly, to your knowledge,</p> <p>24 catalog drawings based by product?</p> <p>25 A. That I don't know.</p>

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<p style="text-align: right;">Page 178</p> <p>1 Q. Do you happen to know how frequently Mr. Hardy</p> <p>2 or yourself make drawings for products?</p> <p>3 A. I cannot say. I don't have him working on</p> <p>4 anything specific at the moment.</p> <p>5 Q. Do you ordinarily instruct Mr. Hardy or do you</p> <p>6 yourself make drawings for any new product that Rupp</p> <p>7 Marine launches?</p> <p>8 MR. LOCKTON: Object to form.</p> <p>9 THE WITNESS: I don't. No, I do not.</p> <p>10 BY MR. PFISTER:</p> <p>11 Q. Does Mr. Hardy?</p> <p>12 MR. LOCKTON: Object to form.</p> <p>13 THE WITNESS: Typically he would. We have no</p> <p>14 projects currently in design.</p> <p>15 BY MR. PFISTER:</p> <p>16 Q. Is Mr. Hardy instructed to save all of the</p> <p>17 drafts and all of the --</p> <p>18 A. Nothing --</p> <p>19 MR. LOCKTON: Object to form.</p> <p>20 THE WITNESS: -- in writing.</p> <p>21 MR. LOCKTON: Object to form.</p> <p>22 THE WITNESS: He kind of freelances over there</p> <p>23 to some degree. Sometimes it's hard to keep him</p> <p>24 busy.</p> <p>25</p>	<p style="text-align: right;">Page 179</p> <p>1 BY MR. PFISTER:</p> <p>2 Q. Did you happen to work with Mr. Hardy during</p> <p>3 the document collection phase of this case?</p> <p>4 A. I think I sent him in notes; yeah.</p> <p>5 Q. What kind of notes?</p> <p>6 A. He'd come in late, I'd leave a note on his</p> <p>7 desk.</p> <p>8 Q. What would it say?</p> <p>9 A. Oh, looking for this, that. Nothing specific.</p> <p>10 Q. Can you give me an example?</p> <p>11 MR. LOCKTON: Object to form.</p> <p>12 THE WITNESS: I can't. Nothing specific, I</p> <p>13 can't.</p> <p>14 BY MR. PFISTER:</p> <p>15 Q. You don't recall any specific instructions</p> <p>16 that you gave to him?</p> <p>17 A. Not at the moment.</p> <p>18 Q. Do you happen to know whether anybody else</p> <p>19 participated in the document collection process?</p> <p>20 A. Not that I'm aware of.</p> <p>21 Q. So the only two people that participated in</p> <p>22 the document collection process were you and Mr. Hardy?</p> <p>23 MR. LOCKTON: Object to form.</p> <p>24 THE WITNESS: It depends what document it is,</p> <p>25 what type of document.</p>
<p style="text-align: right;">Page 180</p> <p>1 BY MR. PFISTER:</p> <p>2 Q. Provide me an example.</p> <p>3 A. No, you need to tell me what type of document.</p> <p>4 I mean, that's -- like invoices and such like that, I</p> <p>5 have -- I had no participation in that whatsoever.</p> <p>6 Q. My question was, did you and Mr. Hardy</p> <p>7 participate exclusively in the document collection</p> <p>8 process?</p> <p>9 MR. LOCKTON: Object to form.</p> <p>10 THE WITNESS: No.</p> <p>11 BY MR. PFISTER:</p> <p>12 Q. Who else participated in that process?</p> <p>13 A. Well, Ron collected some documents as well.</p> <p>14 Q. Do you happen to know whether -- and by Ron,</p> <p>15 are you referring to Mr. Karpanty?</p> <p>16 A. Yes.</p> <p>17 Q. Do you happen to know whether Mr. Karpanty</p> <p>18 collected any drawings for Rupp's pulley products?</p> <p>19 A. Those I would say probably not. I don't know</p> <p>20 if he had any communication with Joe regarding documents</p> <p>21 or requested documents. I don't know.</p> <p>22 Q. So with respect to design documents, that was</p> <p>23 exclusively you and Mr. Hardy?</p> <p>24 MR. LOCKTON: Object to form.</p> <p>25 THE WITNESS: If -- yeah, if they were</p>	<p style="text-align: right;">Page 181</p> <p>1 available in CAD form, then he would have produced</p> <p>2 them.</p> <p>3 BY MR. PFISTER:</p> <p>4 Q. Did you instruct Mr. Hardy to produce all</p> <p>5 relevant CAD design drawing documents?</p> <p>6 MR. LOCKTON: Object to form.</p> <p>7 THE WITNESS: That I was aware of.</p> <p>8 BY MR. PFISTER:</p> <p>9 Q. So if you were unaware of a document --</p> <p>10 A. -- then it would not have probably been</p> <p>11 retrieved.</p> <p>12 Q. What about in an instance where a document</p> <p>13 exists but you were unaware of it, would that document</p> <p>14 have been subject to the collection policies?</p> <p>15 MR. LOCKTON: Object to form.</p> <p>16 THE WITNESS: I'm not sure. If I was not</p> <p>17 aware of it, I don't know where it would be.</p> <p>18 BY MR. PFISTER:</p> <p>19 Q. So you're saying that you're aware of the</p> <p>20 location of all design drawings at Rupp?</p> <p>21 MR. LOCKTON: Object to form.</p> <p>22 THE WITNESS: No, I'm saying I don't know</p> <p>23 where they are. Obviously, there were some that we</p> <p>24 still have that are relevant. If they weren't</p> <p>25 produced ten years ago, then they might probably --</p>



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<p style="text-align: right;">Page 182</p> <p>1 they would probably be in the CAD file.</p> <p>2 BY MR. PFISTER:</p> <p>3 Q. I'm sorry. You said "if they weren't produced</p> <p>4 ten years ago." What do you mean by that?</p> <p>5 A. Well, if they're an older drawing, as I</p> <p>6 mentioned, we used to do things by hand and if those --</p> <p>7 the old drawings, I can't guarantee that there are</p> <p>8 any -- or there might be some available. There may not</p> <p>9 be all of them. I don't know.</p> <p>10 Q. A moment ago you said that the documents that</p> <p>11 were produced are the ones that you're aware of. Is</p> <p>12 that what you said?</p> <p>13 MR. LOCKTON: Object to form.</p> <p>14 THE WITNESS: I don't recall what I said.</p> <p>15 BY MR. PFISTER:</p> <p>16 Q. Okay. So was the instruction -- let me ask it</p> <p>17 a different way.</p> <p>18 Did you collect or did you instruct Mr. Hardy</p> <p>19 to collect all responsive documents?</p> <p>20 MR. LOCKTON: Object to form.</p> <p>21 THE WITNESS: I gave him direction for some</p> <p>22 and what I guess I -- at the time I thought was</p> <p>23 relevant.</p> <p>24 BY MR. PFISTER:</p> <p>25 Q. So you provided Mr. Hardy an instruction to</p>	<p style="text-align: right;">Page 183</p> <p>1 collect relevant design documents; is that correct?</p> <p>2 MR. LOCKTON: Object to form.</p> <p>3 THE WITNESS: Yes.</p> <p>4 BY MR. PFISTER:</p> <p>5 Q. Did you instruct Mr. Hardy to make his own</p> <p>6 determination on what he believed was relevant?</p> <p>7 MR. LOCKTON: Object to form.</p> <p>8 THE WITNESS: Probably would be to some</p> <p>9 degree, yes.</p> <p>10 BY MR. PFISTER:</p> <p>11 Q. Do you happen to know whether Mr. Hardy</p> <p>12 produced any documents directly to your attorneys in</p> <p>13 this case?</p> <p>14 A. That I do not know.</p> <p>15 Q. And I believe earlier you testified that you</p> <p>16 produced some documents to your attorneys in this case?</p> <p>17 A. I did.</p> <p>18 Q. Did Rupp utilize the services of a third-party</p> <p>19 document collection vendor?</p> <p>20 MR. LOCKTON: Object to form.</p> <p>21 THE WITNESS: No.</p> <p>22 BY MR. PFISTER:</p> <p>23 Q. Do you happen to know offhand what Mr. Hardy's</p> <p>24 e-mail address is?</p> <p>25 A. Not offhand I don't.</p>
<p style="text-align: right;">Page 184</p> <p>1 Q. Do you happen to know offhand how long</p> <p>2 Mr. Hardy's been employed by Rupp Marine?</p> <p>3 A. I'm going to guess it's been six years, maybe</p> <p>4 five.</p> <p>5 Q. And has his role been consistent the whole</p> <p>6 time he's been there?</p> <p>7 A. For a period of time he worked as an employee,</p> <p>8 assembled production. He was involved.</p> <p>9 Q. Did you have someone preparing design drawings</p> <p>10 prior to Mr. Hardy's tenure at Rupp Marine?</p> <p>11 A. Yes.</p> <p>12 Q. Who?</p> <p>13 A. The gentleman that passed.</p> <p>14 Q. Did that gentleman prepare any CAD drawings?</p> <p>15 A. For I, yeah, possibly.</p> <p>16 Q. Has Rupp Marine utilized the same computer</p> <p>17 system since 2015?</p> <p>18 MR. LOCKTON: Object to form.</p> <p>19 THE WITNESS: That I'm not sure of.</p> <p>20 BY MR. PFISTER:</p> <p>21 Q. Let me ask a different way. Is it possible</p> <p>22 for Rupp to have stored on its computer files that date</p> <p>23 back to 2015?</p> <p>24 A. That I'm not sure of.</p> <p>25 Q. You don't know or --</p>	<p style="text-align: right;">Page 185</p> <p>1 A. I don't know.</p> <p>2 Q. Okay. When you provided all of the documents</p> <p>3 to your attorneys, did you state these are all the</p> <p>4 documents we have in our possession?</p> <p>5 MR. LOCKTON: Object to form. Don't answer.</p> <p>6 Privileged information. If you can answer</p> <p>7 without --</p> <p>8 BY MR. PFISTER:</p> <p>9 Q. Right, right. They're absolutely correct.</p> <p>10 Don't tell me anything they said to you. Don't tell me</p> <p>11 anything they communicated in terms of what you should</p> <p>12 or shouldn't do. I simply want to know what you stated.</p> <p>13 MR. LOCKTON: Yeah, don't answer that.</p> <p>14 MR. PFISTER: He can answer what he said.</p> <p>15 MR. LOCKTON: No. You don't have to answer</p> <p>16 that, and I'm instructing you not to answer that to</p> <p>17 the extent you're telling us responsive information</p> <p>18 for this case for the purpose of this case.</p> <p>19 MR. PFISTER: Okay. So you're instructing the</p> <p>20 witness not to answer the question of whether he</p> <p>21 stated that he's produced all responsive documents;</p> <p>22 is that correct?</p> <p>23 MR. LOCKTON: I'm instructing the witness not</p> <p>24 to answer what he told us in the context of his</p> <p>25 attorney-client privilege; yes.</p>

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<p style="text-align: right;">Page 186</p> <p>1 MR. PFISTER: I would like to know if that's</p> <p>2 specific to whether or not you're instructing the</p> <p>3 witness to refrain from stating on that basis, that</p> <p>4 he peruse all responsive documents.</p> <p>5 MR. LOCKTON: Don't answer any question about</p> <p>6 what your communication was to us.</p> <p>7 Yes, if you want to ask him a different</p> <p>8 question that's not about communications, you're</p> <p>9 more than welcome to.</p> <p>10 BY MR. PFISTER:</p> <p>11 Q. Do you believe that you produced all</p> <p>12 responsive documents that relate to design drawings in</p> <p>13 this case?</p> <p>14 A. To my knowledge.</p> <p>15 Q. Do you believe that there is documents that</p> <p>16 are housed on Rupp's system that pertain to design</p> <p>17 drawings of the accused products, the pully clusters in</p> <p>18 this case, that were not produced?</p> <p>19 MR. LOCKTON: Object to form.</p> <p>20 THE WITNESS: I do not know.</p> <p>21 BY MR. PFISTER:</p> <p>22 Q. You don't know?</p> <p>23 A. I don't know.</p> <p>24 Q. Is it possible?</p> <p>25 A. I don't know.</p>	<p style="text-align: right;">Page 187</p> <p>1 Q. Do you happen to know offhand whether there</p> <p>2 are documents saved on Rupp's computer system that are</p> <p>3 different than the design drawings that we were looking</p> <p>4 at previously?</p> <p>5 MR. LOCKTON: Object to form.</p> <p>6 THE WITNESS: I do not know.</p> <p>7 BY MR. PFISTER:</p> <p>8 Q. Is it possible?</p> <p>9 A. I don't know.</p> <p>10 Q. Does Rupp utilize any 3D modeling?</p> <p>11 MR. LOCKTON: Object to form.</p> <p>12 THE WITNESS: I believe so.</p> <p>13 BY MR. PFISTER:</p> <p>14 Q. Is that modeling part of a computer program?</p> <p>15 A. I believe so.</p> <p>16 Q. Is that computer program the same computer</p> <p>17 program that generates the drawings that we were</p> <p>18 referencing earlier?</p> <p>19 A. I don't know.</p> <p>20 Q. You don't know?</p> <p>21 A. No.</p> <p>22 Q. Does the -- do you know whether or not those</p> <p>23 files that are part of that 3D modeling are saved to</p> <p>24 Rupp's system?</p> <p>25 A. I would guess they are.</p>
<p style="text-align: right;">Page 188</p> <p>1 Q. Do you happen to know whether or not those 3D</p> <p>2 model files are delivered to any of Rupp's third-party</p> <p>3 manufacturing partners?</p> <p>4 MR. LOCKTON: Object to form.</p> <p>5 THE WITNESS: I do not know.</p> <p>6 BY MR. PFISTER:</p> <p>7 Q. Is it possible?</p> <p>8 A. I don't know.</p> <p>9 Q. Have you ever delivered a 3D model file to a</p> <p>10 manufacturing partner of Rupp Marine?</p> <p>11 MR. LOCKTON: Object to form.</p> <p>12 THE WITNESS: Me personally, no.</p> <p>13 BY MR. PFISTER:</p> <p>14 Q. Has Tom Hardy, to your knowledge, ever</p> <p>15 delivered a 3D manufacturing file to a third-party</p> <p>16 manufacturer of Rupp Marine?</p> <p>17 MR. LOCKTON: Object to form.</p> <p>18 THE WITNESS: Possibly.</p> <p>19 BY MR. PFISTER:</p> <p>20 Q. I am going to hand you Plaintiff's 16. This</p> <p>21 is Rupp 003399.</p> <p>22 (Plaintiff's Exhibit No. 16 was marked for</p> <p>23 ID.)</p> <p>24 BY MR. PFISTER:</p> <p>25 Q. Mr. Rupp, can you tell me what you see in this</p>	<p style="text-align: right;">Page 189</p> <p>1 photo?</p> <p>2 MR. LOCKTON: Object to form.</p> <p>3 THE WITNESS: It's a boat show display.</p> <p>4 BY MR. PFISTER:</p> <p>5 Q. Are there any specifics about whose boat show</p> <p>6 display you can identify?</p> <p>7 A. I clearly see our logo.</p> <p>8 Q. Do you happen to know if this was a boat show</p> <p>9 that Rupp Marine was actually participating in?</p> <p>10 MR. LOCKTON: Object to form.</p> <p>11 THE WITNESS: I see our display.</p> <p>12 BY MR. PFISTER:</p> <p>13 Q. So it's safe to say this is a Rupp Marine</p> <p>14 display at a boat show?</p> <p>15 A. I would say it is.</p> <p>16 Q. Do you happen to know when this boat show took</p> <p>17 place?</p> <p>18 A. Not at all.</p> <p>19 Q. You have no idea?</p> <p>20 A. No idea.</p> <p>21 Q. And there's nothing that's in the photograph</p> <p>22 that may jog your memory?</p> <p>23 A. Nothing.</p> <p>24 Q. Okay. So it's entirely possible that this</p> <p>25 could have been last year's boat show?</p>